

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**U.S. SECURITIES AND EXCHANGE
COMMISSION**
Plaintiff,

CIV. ACTION NO.3-09CV0298-N

V.

**STANFORD INTERNATIONAL BANK,
LTD., ET AL.,
Defendants.**

DEFENDANTS’ MOTION TO DISQUALIFY BAKER BOTTS L.L.P.

TO THE HONORABLE JUDGE:

COMES NOW, DEFENDANTS, STANFORD INTERNATIONAL BANK, LTD., STANFORD FINANCIAL GROUP COMPANY, STANFORD GROUP COMPANY, and R. ALLEN STANFORD, (hereinafter “Defendants”), who file this Motion to Disqualify Baker Botts L.L.P. (“Baker Botts”) pursuant to Local Rule 7.1 and respectfully show the Court as follows:

As discussed more fully in the accompanying Brief Supporting Defendants' Motion to Disqualify Baker Botts L.L.P., denial of Defendants' Motion to Disqualify would serve only to perpetuate a clear and ongoing conflict of interest situation involving Baker Botts, severely prejudicing and causing irreparable harm to the Defendants.

Defendants request an expedited hearing on said Motion.

Defendants respectfully requests that Baker Botts L.L.P. be disqualified as counsel for the Receiver.

Respectfully submitted,

/s/ Ruth Brewer Schuster
Ruth Brewer Schuster
Texas Bar No. 24047346
1201 Connecticut Ave, NW, Ste. 500
Washington, DC 20036
(202) 683-3160

Michael D. Sydow
Sydow & McDonald
4400 Post Oak Parkway., Ste. 2360
Houston, TX 77027
(713) 622-9700

Christina Sarchio
Patton Boggs LLP
2550 M Street, NW
Washington, DC 20037
202-457-7527
Pro Hac Vice Application to be submitted
Counsel for R. Allen Stanford only

Patton Boggs LLP
2001 Ross Avenue, Ste. 3000
Dallas, Texas 75201
214-758-1500

ATTORNEY IN CHARGE FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent those indicated as non-registered participants on June __, 2009.

/s/Ruth Brewer Schuster

CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that I have complied or attempted to comply with the meet and confer requirement in Local Rule 7.1. Mr. Sadler, of Baker Botts, opposes the motion. Mr. Tillotson, counsel for Lara Pendergest-Holt, has stated that he will inform the court of his client's stance at a later date. Mr. Lena, counsel for U.S.D.O.J. (IRS), opposes the motion. I was unable to reach Mr. Reece, counsel for the SEC, and Mr. Little, Court-appointed Examiner.

/s/ Ruth Brewer Schuster